

Ms. Laurie Allen  
Acting Director, Office of Protected Resources  
National Marine Fisheries Service - 13<sup>th</sup> floor  
1315 East-West Highway  
Silver Spring, MD 20910

Dear Ms. Allen:

The Office of Pesticide Programs (OPP), US Environmental Protection Agency (EPA) respectfully requests the initiation of Endangered Species Act (ESA) section 7(a)(2) consultation. This consultation request addresses three (3) Evolutionarily Significant Units (ESU's) of Pacific salmon and steelhead that have been listed as Federally endangered or threatened, and one pesticide active ingredient registered by EPA under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), for uses within the range of the listed ESUs. The pesticide active ingredient subject to this request is methamidophos which is an organophosphate pesticide registered for control of aphids, Colorado potato beetles, green peach aphids, leafhoppers, leafminers, kygus bugs, stink bugs, tomato pinworms, and whiteflies on cotton, potatoes, tomatoes and alfalfa for seed. Our long-term intent is to make effects determinations and consult, as appropriate, relative to all listed species and locations. However, as per agreement with the National Marine Fisheries Service, this request is limited to Pacific salmon and steelhead for which NMFS has responsibility.

Methamidophos has some toxicity to fish and to the food supply of some aquatic invertebrates. However, based on the best available data on usage, environmental fate characteristics, the habitat for the individual ESU's and other information, OPP has determined that only some methamidophos uses may affect but are not likely to adversely affect three listed Pacific salmon and steelhead ESUs; and methamidophos use will have no effect on the remaining twenty three ESUs.

A summary table at the back of the attached analysis indicates the specific determinations made for each of the 26 ESUs. I am requesting your concurrence, under the informal consultation process, on OPP's determination that the registered use of methamidophos is not likely to adversely affect the following listed Pacific salmon and steelhead ESU's: The Upper Columbia River Chinook, Upper Columbia River steelhead; and Middle Columbia River steelhead. We are not requesting consultation on the remaining twenty three since we have determined that methamidophos use will have no effect on those ESUs.

OPP is working toward a final endangered species program which is expected to be final within the next several months. We are developing county-specific bulletins to address pesticide use and endangered and threatened species. It is through such bulletins, and pesticide product label reference to them, that OPP intends to implement and enforce protections for listed species, including any necessary protections for listed salmon and steelhead.

I look forward to working with NMFS to protect and help recover listed species. If you have any questions, please feel free to contact me on (703) 305-5239, or your technical staff may contact Michael Patterson, our review biologist, at (703) 605-0649.

enclosures

Sincerely,

Arthur-Jean B. Williams, Chief  
Environmental Field Branch  
Field and External Affairs Division (7506C)

cc: Craig Johnson